

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

JUDITH FONSECA

v.

C.A. NO: 04-11870 WGY

BROOKS PHARMACY, INC. and  
MC WOONSOCKET, INC.

**DEFENDANTS' REQUEST FOR PRODUCTION**  
**PROPOUNDED TO PLAINTIFF**

Pursuant to FRCP 34, the Defendants, request that the Plaintiff, Judith Fonseca, produce for inspection and/or copying at the office of GIDLEY, SARLI & MARUSAK, LLP, One Turks Head Place, Suite 900, Providence, Rhode Island, 02903 within **thirty (30)** days of the date hereof, the following documents:

1. Any and all of the plaintiff's medical records, bills and reports, of whatever nature and kind, including office notes and x-rays, from any and all physicians, hospital or other health care providers and correspondence with attorneys which relate in any way to the alleged injury which is the subject of this litigation or sufficient authorizations to secure them.
2. Any and all of the plaintiff's medical records, bills and reports, of whatever nature and kind, including office notes and x-rays, from any and all physicians, hospitals or other health care providers which relate in any way to all injuries, whenever suffered, similar to the alleged injury which is the subject of this litigation or sufficient authorizations to secure them.
3. Any and all of the plaintiff's medical records, bills and reports of whatever nature and kind, including office notes and x-rays, from any and all physicians, hospitals or other health care providers for a period of five (5) years before the time of the occurrence alleged in the complaint to the present date or sufficient authorizations to secure them.
4. W-2 forms furnished by any employer and Schedule C forms for a period of five (5) years prior to the alleged incident to the present date or sufficient authorizations to secure them.


5. All employment records relating in any way to the plaintiff for a period of five (5) years before the occurrence alleged in the complaint to the present including income records and records of the dates lost from work for any reason whatsoever or sufficient authorizations to secure them.

6. All statements taken from any defendant or from agents or employees of any defendant regarding the incident which is the subject of this litigation.

7. All statements given by plaintiff regarding the incident which is the subject of this litigation, other than those covered by the attorney-client privilege or sufficient authorizations to secure them.

8. Any and all incident reports, witness statements, or investigatory data or other documents concerning the subject incident.

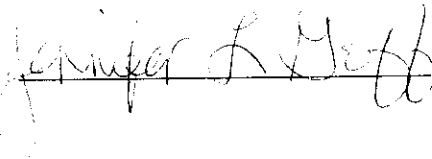
Defendants,  
By their Attorneys:

  
\_\_\_\_\_  
Michael R. De Luca, BBO # 639509  
Gidley, Sarli & Marusak, LLP  
One Turks Head Place, Suite 900  
Providence, RI 02903  
(401) 274-6644  
(401) 331-9304 fax

**CERTIFICATION**

John M. Sahady, Esq.  
Sahady Associates, PC  
399 North Main Street  
Fall River, MA 02720

I hereby certify that a true copy of the within was served by mail upon counsel of record, as above, on the 12 day of November, 2004.

  
\_\_\_\_\_  
Jennifer L. Geth